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OFFICE OF THE ATTORNEY GENERAL

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February 25, 2020

Via ECF

The Honorable Lois Bloom
United States District Court for the Eastern District of New York
Theodore Roosevelt United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Capogrosso v. Gelbstein, et al., No. 18 Civ. 2710 (EK) (LB)

Dear Judge Bloom,

This Office represents Defendants Alan Gelbstein, Ida Traschen, and Danielle Calvo, in their individual capacities, and Mark Schroeder, Commissioner of the New York State Department of Motor Vehicles, in his official capacity (collectively, the "State Defendants") in the above-referenced matter. I write on behalf of the State Defendants and Plaintiff Mario Capogrosso, pursuant to Your Honor's February 18, 2020 Order, Dkt. No. 111, to update the Court regarding an agreement on deposition times for the individual State Defendants.

Mr. Capogrosso has requested to hold the deposition of Alan Gelbstein at 9:00 a.m. on April 29, 2020, to be followed by the depositions of Ida Traschen at 11:00 a.m. and Danielle Calvo at 12:30 p.m. The State Defendants have agreed to these times. Mr. Capogrosso anticipates deposing additional parties and witnesses during the afternoon.

Additionally, the Plaintiff and the State Defendants have agreed on the date of April 28, 2020 for the State Defendants to take the Plaintiff's deposition, and respectfully request that a room at the courthouse be made available on that date. We thank the Court for its time and attention to these matters.

Respectfully submitted,

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Cc: All counsel of record (via ECF)

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